CHOLLAS CREEK METALS TMDL STAKEHOLDER MEETING
June 21, 2010
2:30 – 4:30 p.m.
Martin Luther King, Jr. Recreation Center
6401 Skyline Drive
San Diego, CA 92114-5632

MEETING SUMMARY

Attendees:

Anastacio Castillo, *Jacobs Center*
Bill Harris, *City of San Diego**
Charles Davis, *Jacobs Center*
Clem Brown, *City of San Diego**
Constantine Kontaxis, *Caltrans**
Cora Long, *City of Lemon Grove**
Dave Gibbs, *San Diego Coastkeeper*
David Renfrew, *Weston Solutions*
Drew Kleis, *City of San Diego**
Eric Becker, *State Water Resources Control Board*
Jen Kovecses, *San Diego Coastkeeper*
Jen Shira, *Katz & Associates*
Jim Varnadore, *City Heights Community Planning Group*
Joe Kuhn, *City of La Mesa**
John Stump, *Chollas CREAC*
Kris McFadden, *City of San Diego**
Len Sinfield, *U.S. Navy**
Leslie Reynolds, *Groundwork Chollas*
Lewis Michaelson, *Katz & Associates*
May Alsheikh, *Caltrans**
Neda Shoushtari, *IEA*
Ruth Kolb, *City Of San Diego**
Sharon Hudnall, *Jacobs Center*
Stephanie Bauer, *Port of San Diego**
Stephanie Bracci, *City of San Diego**
Tracy Cline, *County of San Diego**

* *Chollas Creek Metals TMDL Discharger*

I. Welcome

The meeting began with a round of introductions, followed by a description of the purpose of the meeting (to update stakeholders on TMDL efforts), and background information on the Chollas Creek TMDL.

II. 2009-2010 Monitoring Efforts Presentation

Ruth Kolb and Weston presented results from monitoring efforts completed for the Chollas Creek dissolved metals TMDL in 2009-2010. Key findings include:

SD8(1) North Fork Monitoring Station

- Copper and Zinc were above acute and chronic wasteload allocations during the first and second storms.
- Only copper was above the chronic wasteload allocations during the third storm.
- Lead was above chronic wasteload allocations during the first and second storms.

DPR (2) South Fork Monitoring Station

- Copper was above acute and chronic wasteload allocations during the first and second storms.

- Copper was above chronic wasteload allocation during the third storm.
- Lead was above chronic wasteload allocation during the first and second storm.

General

- A long-term decline in Diazinon detections has been observed since the EPA ban on this pesticide went into effect. Diazinon was detected once and was below water quality criteria.
- No acute or chronic survival toxicity to *Ceriodaphnia.dubia.*
- Reproductive toxicity to *C. dubia* observed in 11/28/09 event at SD8(1) only.
- Toxicity to the amphipod *Hyalella.azteca* was observed at all sites.
- Synthetic pyrethroids detected at all sites during all events .
- Bacteria exceedences occurred during all monitoring events.

Stakeholder Comments:

- The comparison/correlation of the amount of rainfall with metals concentrations was helpful.
- Another stakeholder inquired about the availability of the data presented at this meeting. The presentations are now available on the Chollas Creek TMDL Dischargers' webpage at http://www.sandiego.gov/stormwater/plansreports/chollas.shtml

III. TMDL Dischargers current projects update:

Each discharger (City of Lemon Grove, City of La Mesa, City of San Diego, County of San Diego, Port of San Diego, U.S. Navy and Caltrans) provided brief presentations of their own agencies' projects in the Chollas Creek watershed. The purpose of the presentations was to update the stakeholder workgroup on activities completed in 2009-2010 or currently being implemented to address the TMDL.

A. City of Lemon Grove

Cora Long from the City of Lemon Grove presented the City's current project, several potential small stream restoration projects using the County's Vector Control Grant for funding. The streams contain large quantities of invasive species, which prevent the water from flowing properly and encourage mosquito breeding. The projects would involve removing the invasive species, slope restoration and stabilization and maintenance of a native habitat.

Stakeholder Comments:
In response to the City of Lemon Grove's presentation, one attendee asked if the city has the data to support the mini-creek restoration project. Ms. Long said the city has from dry weather data and the County's Vector Control Department. Vector Control performs regular mosquito abatement in the channels the City wants to rehabilitate.

B. La Mesa

Joe Kuhn from the City of La Mesa presented current projects including a municipal code modification, watershed outreach presentations, clean-up events along the University Channel, and Industrial/Commercial watershed education questionnaires.

Stakeholder Comments:
In response to the City of La Mesa's presentation, one attendee asked to clarify how the municipal code update would pertain to the Chollas TMDL. Mr. Kuhn responded that the update gave the City additional authority to be able to require BMPs above minimum BMP standards, if based on a TMDL Order. Another attendee asked to clarify the location of the University Channel. Mr. Kuhn responded that it is runs on east side of University Ave. toward the La Mesa/San Diego border. It has earthen day-lighted sections and sections which are within a reinforced concrete box.

C. Port of San Diego

The Port of San Diego presented information on three activities that were completed in 2009-2010 for which the Port provided funding through their Environmental Fund program. The activities were: 1) the Chollas Creek Family Stream Team Initiative; 2) the Chollas Creek Student Stream Restoration Team; and 3) Stream Team Stewards. These activities primarily focused on education, cleanups and collection events, restoration, and outreach efforts within the Chollas Creek watershed. More detailed information on the Port's activities is available in reports which are posted on the Port's website, http://www.portofsandiego.org/environment/projects-a-progress-reports.html.

Stakeholder Comments
An attendee inquired whether the cleanup efforts associated with the three activities can be directly correlated with reduced pollutant levels, and how this type of activity fits in with other pollution prevention measures to meet TMDL compliance. Though not directly quantifiable, cleanup activities indirectly reduce bacteria and metals as a result of the removal of trash and debris. It was also acknowledged that trash cleanups provide more benefits than simple removal of trash – these are events that also involve education, outreach, and public participation.

D. County of San Diego

The County provided updates to County Facility BMP Projects. Projects were put on hold during state funding freeze. Projects were reduced by one due to change in lease arrangements. Funding was restored during this FY and therefore planning and design phases are moving forward

Stakeholder Comments
A stakeholder wanted to know which facility was dropped. The County will provide this information to Mr. Davis in an email. A stakeholder inquired to how the County is dealing with synthetic pyrethroids in this watershed. He was informed that the County

has adopted a policy regarding pesticide use and participates in the Integrated Pest Management (IPM) program.

E. Caltrans

Con Kontaxis presented examples of BMPs that have been approved for use within Caltrans right of way. Currently Caltrans Headquarters is testing the use of open graded friction course to be use along the freeway shoulders as a possible BMP to treat roadway runoff. Once the study results are complete and if favorable, Caltrans will look at using this within the Chollas Creek watershed.

Stakeholder Comments
Attendees asked about chain link fencing. Metal beam guardrail was also brought up and discussed along with metal beam guardrail posts. Currently there are no plans for Caltrans to analyze replacement of chain link fence. Caltrans is currently upgrading their facilities replacing MBGR with concrete barrier and replacing corrugated metal pipe with reinforced concrete pipe or high density polyethylene pipe. MBGR posts are treated with an environmentally friendly product (per industry standards) which began approximately 3 to 5 years ago.

F. US Navy

Creek Trash Removal Program
The Navy is continuing to remove accumulated trash from two booms across the lower reach of Chollas Creek and Navy personnel participate in annual creek cleanup events.

MS4 permitting
The MS4 permit for Naval Base San Diego (NBSD) has been delayed by the Regional Water Quality Control Board. The permit should be adopted sometime this summer.

Low Impact Development for new construction projects
The Navy has recently issued a low impact development (LID) program for all new construction projects, in fact, all Federal agencies now must implement LID. The LID will be implemented using a LID based Unified Facility Construction to be given to all Navy contractors.

Landscape runoff reduction & elimination/Xeroscape conversion
Almost all of the landscaping at NBSD has been eliminated or converted to either artificial turf or xeroscape.

Assessment of copper and zinc in non-storm water industrial discharges
Navy is currently conducting monitoring of industrial discharges at NBSD.

Stakeholder Comments
In response to the U.S. Navy's presentation, one attendee said that there is quite a bit of Navy housing within the Chollas Creek area and asked what the Navy is doing to address

storm water and discharges from these areas. Mr. Sinfield indicated there are programs in place for residential properties and that the Navy housing within the watershed is under the jurisdiction of the commander of Naval Base San Diego. Policies issued by the commander are implemented at the Navy housing areas. For instance, no car washing or auto repair is allowed at the Navy housing areas. Mr. Sinfield will research and provide a list of Navy housing areas within the Chollas Creek watershed.

G. City of San Diego

Clem Brown presented information on an Aggressive Street Sweeping Pilot Project that the City of San Diego implemented in three watersheds, including Chollas Creek. The study showed that sweeping is an effective means of removing metals from the roadway. The study also showed that, while vacuum sweepers appeared to be more effective at removing debris and improving water quality than regenerative air sweepers or the traditionally used mechanical sweepers, results were site specific based on street conditions. Due to time constraints, the City did not present information on Rain Barrels as planned.

Stakeholder Comments:
No comments were provided on street sweeping.

IV. Future Projects Discussion:

The stakeholder workgroup was given a list of five projects, which are currently in the planning phase, for the purpose of obtaining input from the stakeholders. Due to time constraints, the workgroup was requested to prioritize the projects and identify which ones they would most like to discuss. The projects were discussed in the following order and are summarized below.

Code/Policy Modification (City of Lemon Grove)

Cora Long distributed a handout explaining Lemon Grove' Green Policy and explained that the goal of the project is to create and promote Green on a City-wide basis. The City's goal is to ensure that stormwater is included in the City's Greening plan. The City desires the plan to be as comprehensive as possible in providing environmental stewardship.

Stakeholder Comments:
No stakeholder comments were provided on this project.

Treatment BMP Implementation (Caltrans)

Constantine Kontaxis provided a presentation on Caltrans future treatment BMPs projects which included approved BMPs including: biofiltration swales and strips, extended detention basins, Austin sand filters, and infiltration basins. Potential future BMPs that

are currently being tested are open/gap graded asphalt pavement water quality studies and roadside vegetated treatment site studies.

Stakeholder Comments:
One attendee asked what kind of vegetation is proposed for the biofiltration swale. Mr. Kontaxis explained Caltrans is looking at a variety of vegetation options, including ice plant.

MS4 Management and Copper/Zinc Reduction (US NAVY)

MS4 Management Plan
The MS4 permit, which will come out this summer, will have MS4 requirements for NBSD. An MS4 management plan draft has been completed and will be finalized when the permit is issued. The plan will focus on metals in storm water runoff. Navy is currently reviewing MS4 Best management practices for implementation at NBSD.

Copper and zinc minimization
Navy is currently developing a copper and zinc minimization plan for NBSD based upon, in part, on-going monitoring of industrial discharges. NBSD did issue a policy letter restricting galvanized material use at NBSD. Private car washing is forbidden onboard NBSD and government vehicles must be washed at commercial/industrial car washes. Navy will take aggressive LID implementation for the area subject to the MS4. It is known that most of the Cu/Zn mass in the storm water is from transportation (Automobiles) at NBSD.

Navy will research the issue of LID implementation at off-base Navy housing areas and will check on the number of Navy housing units within the Chollas Creek watershed.

Navy is currently preparing NPDES compliance schedules for industrial discharges. Navy has submitted a letter supporting the brake pad initiative (SB 346). Also, Navy is replacing the use of sand/grit sand blasting with alternative paint removal techniques (i.e., hydroblasting). This replacement will be implemented through contractor user agreements.

Stakeholder Comments: How was LID being implemented at the Navy housing units? Mr. Sinfield responded that the LID policy was being implemented through Navy contracts using our Unified Facilities Criteria (UFC) – the Navy's building code. All contractors doing construction aboard Navy property must implement the new LID policy. The UFC was later sent to Mr. Gibbs of Coastkeeper via an email request.

Water Effects Ratio Study (City of San Diego)

Ruth Kolb and Weston provided a presentation on the City of San Diego's Chollas Creek Water-Effect Ratio Study which outlined the rationale for the study:

- Historically, toxicity in Chollas related to pesticides not dissolved metals.

- Dissolved organic carbon influences toxicity more than other water quality parameters.
- USEPA recognizes that dissolved metals criteria may be more or less stringent (USEPA, 1994).
- Previous WER studies (e.g., Calleguas Creek and South San Francisco Bay) indicate copper WER >1, most lead and zinc final WER > 1.

The presentation also provided the final WER/SSO calculations, preliminary results, how the California Toxics Rule and the WER works, and a project schedule. The study is scheduled to be complete in January 2011.

Stakeholder Comments:
One attendee asked Ms. Kolb and Mr. Renfrew to clarify how the WER relates to the site specific objectives in Chollas Creek. They responded that this study could lead to a revision of the TMDL, however the decision on any potential modifications to the TMDL would be made by the Regional Board.

Commercial Self-Certification BMP Pilot Project (City of La Mesa)
Due to time constraints the City of La Mesa's Commercial Self-Certification BMP Pilot the project was not discussed.

V. Wrap up:

The following action items were identified for the Dischargers:

- Each discharger is to provide a summary of their agencies' internal policies regarding usage of synthetic pyrethroid pesticides (see accompanying response page);
- Each dischargers to provide information on their agencies' requirements for BMPs at industrial/commercial facilities similar to what La Mesa presented (see accompanying response page)
- Post presentations on the Think Blue website (completed)

The workgroup discussed the frequency of future stakeholder workgroup meetings. The attendees agreed the workgroup could meet annually with periodic e-mail updates regarding the progress of the TMDL Implementation Plan and the status of projects.

Supplemental Responses to Chollas Creek Metals TMDL Stakeholder Questions

During the Chollas Creek Metals TMDL Stakeholder meeting held on June 21, 2010, two general questions were asked of every discharger. One was on internal synthetic pyrethroid pesticide usage. The other was on policies compelling the use of BMPs at businesses.

Discharger Responses to these general questions are included below and are in the following sequence: 1) synthetic pyrethroid usage and 2) BMP policies.

County of San Diego:

1) The County has adopted a policy regarding pesticide use and participates in the Integrated Pest Management (IPM) program.
2) The County has authority under our Watershed Protection Ordinance (WPO) to require additional BMP's during our facility inspections if necessary and warranted. While these are not specific to a particular TMDL it does provide the mechanism to require BMP's on facilities.

Port of San Diego:

1) The Port does not use synthetic pyrethroid pesticides for pest management. The Port participates in the Integrated Pest Management (IPM) Program and adopted BPC Policy No. 737 regarding pesticide use on all Port facilities and operations.
2) The Port of San Diego has authority under the San Diego Unified Port District Code Article 10 (Stormwater Management and Discharge Control) to require additional BMP's during our facility inspections if necessary and warranted. Facilities may be required to implement further BMPs if the minimum are not working or if the BMPs not properly in place. This may depend on the type of facility, the facility's location and the facility's historical compliance record. The Port is able to evaluate compliance and potential pollutant causing activities through our annual inspection process.

   An attendee also inquired about policies and/or BMPs of the San Diego County Regional Airport Authority, which was not named in the Chollas Creek TMDL. It was suggested to contact the Airport Authority for details on their agencies' pesticide use and BMP requirements.

City of San Diego:

1) The City's Park and Recreation Department did not use synthetic pyrethroids in the Chollas Creek Watershed in FY2010.
2) Per the San Diego Municipal Code (SDMC), the City has the authority to inspect industrial and commercial facilities, require facilities to control pollution coming from their properties, make recommendations on BMP usage to control pollution, and impose notices of violation and monetary fines on those facilities that allow the discharge of pollutants into the storm water conveyance system. The minimum BMPs for Industrial

and Commercial Sites/Sources included in Appendix X of the City's Jurisdictional Urban Runoff Management Plan (http://www.sandiego.gov/stormwater/plansreports/jurmp.shtml) are the minimum recommended BMPs. After the last update to the Storm Water section of SDMC, the City's approach was to first educate the public regarding the updated regulations prior to more significant follow up, except in the case of significant discharges. While continuously educating citizens and businesses, the City has since transitioned into an enforcement approach to ensure that businesses comply.

City of La Mesa

1) In response to the stakeholder question regarding synthetic pyrethroid usage, the City of La Mesa does not currently use synthetic pyrethroids for pest management. There is currently no specific policy regarding synthetic pyrethroid usage.
2) The City of La Mesa recently modified its municipal code to include a section which specifically concerns the City's authority to require a facility to implement additional BMPs due to a Total Maximum Daily Load Order.

City of Lemon Grove

1) The City adopted a policy regarding pesticide use and participates in the Integrated Pest Management (IPM) Program. The City has long advocated a limited use of pesticides and maintains native vegetation at all its parks and open space areas.
2) The City under its Code Enforcement Policy has the ability to require any needed BMPs of its industrial/commercial facilities, including BMPs not listed in the City's JURMP. BMP requirements above the level of the JURMP are required on an as needed basis depending on the type of facility, the facility's location and the facility's historical compliance record. The City's annual inspection process is used to evaluate compliance and potential pollutant causing activities.

US Navy

1) The Navy has adopted a policy regarding pesticide use and participates in an Integrated Pest Management (IPM) program.

2) The Navy is developing MS4 BMP's as part of our soon to be adopted MS4 NPDES permit program. Navy also has existing LID policy for new construction on Navy bases as a Unified Facility Criteria (UFC 3-210-10). All contractors on Navy bases must implement this UFC/LID. The UFC is available at: www.wbdg.org/ccb/DOD/**UFC**/**ufc**_3_210_10.pdf

Caltrans

1) Caltrans has an integrated roadside vegetation management (IRVM) program and completed an EIR in late 1992 which shifted the focus from relying solely on chemical vegetation control to establishing native grasses and low-growing non-native fescues. Caltrans use of pesticides, including synthetic pyrethroids, is minimal.

2) Caltrans does an Annual Facility Pollution Prevention Program Inspection. We have 2 maintenance facilities in the Chollas Creek watershed. The following BMP categories are inspected to ensure compliance with Caltrans NPDES Permit (Order No. 99-06-DWQ) and the Maintenance Staff Guide (CTSW-RT-02-057):
    a. Safer alternative products.
    b. Building and ground maintenance.
    c. Housekeeping practices.
    d. Above ground tank leak and spill control.
    e. Vehicle and equipment maintenance, repair, fueling, and pressure washing.
    f. Storage of hazardous material and hazardous waste.
    g. Outdoor storage of raw material.
    h. Waste minimization, handling, and disposal.